

Mike Reed  
Elpaco Coatings Corporation  
P.O. Box 1769  
Elkhart, Indiana 46515

Re: **039-14183**  
Minor Source Modification to:  
Part 70 Operating Permit No.: **T 039-8940-00248**

Dear Mr. Reed:

Elpaco Coatings Corporation was issued a Part 70 operating permit T 039-8940-00248 on January 19, 2000 for a paint production source. Administrative Amendments 039-11967 and 039-11995 were issued on April 12, 2000 and August 4, 2000, respectively. Applications to modify the source were received on March 26, 2001 and April 19, 2000. Pursuant to 326 IAC 2-7-10.5, the following emission unit is approved for construction at the source:

One (1) mill, identified as SW, exhausting through the general ventilation stack (GV), capacity: 245.09 pounds of raw material per hour.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission unit constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This minor source modification authorizes construction of the new emission unit. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification (SPM 039-14360-00248) in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact CarrieAnn Ortolani, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments (Updated permit document and Technical Support Document for this modification)  
CAO/MES

cc: File - Elkhart County  
Northern Regional Office  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Elpaco Coatings Corporation  
28867 Old US 33 West  
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-8940-00248	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: January 19, 2000  Expiration Date: January 19, 2005

First Administrative Amendment 039-11967-00248, issued on April 12, 2000  
Second Administrative Amendment 039-11995-00248, issued on August 4, 2000

First Minor Source Modification No.: 039-14183-00248	Conditions Changed: A.1, A.2, A.3, D.1.1, D.1.6, D.1.7, and D.2.2 Quarterly Report Forms are also changed.
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: MAY 25, 2001

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary paint production source.

Responsible Official: Max Wyatt  
Source Address: 28867 Old US 33 West, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 1769, Elkhart, Indiana 46515  
Phone Number: 219-295-3991  
SIC Code: 2851  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint production process, identified as EU-01, constructed in 1954, exhausting to the general ventilation stack (GV), with a maximum capacity of 1,308.09 pounds of raw materials per hour, total, consisting of the following:
  - (1) One (1) pebble mill.
  - (2) One (1) steel ball mill.
  - (3) Two (2) sand mills.
  - (4) Three (3) dispersers.
  - (5) Fifteen (15) paint mixers (nine (9) stationary and six (6) portable).
- (b) Four (4) mixing/blending tanks, identified as MT7, MT8, MT9 and MT10, installed in 1998, exhausting to the general ventilation stack (GV), capacity: 475.99 pounds of raw material per hour, total.
- (c) Six (6) mixing tanks, identified as MT1, MT2, MT3, MT4, MT5 and MT6, installed in 1992, exhausting to the general ventilation stack (GV), capacity: 367.91 pounds of raw material per hour, total.
- (d) One (1) mill, identified as SW, exhausting through the general ventilation stack (GV), capacity: 245.09 pounds of raw material per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:
  - (1) One (1) hot water boiler, installed in 1993, capacity: 0.65 million British thermal units per hour; (326 IAC 6-2-4)
  - (2) One (1) steam boiler, installed in 1992, capacity: 0.45 million British thermal units per hour; (326 IAC 6-2-4)
- (b) A laboratory as defined in 326 IAC 2-7-1(21)(C) (326 IAC 6-3).
- (c) Other categories with emissions below insignificant thresholds:
  - (1) Dry material handling (326 IAC 6-3).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).



## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this

permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]**  
**[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
  - (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- (1) The applicable requirements are included and specifically identified in this permit;  
or
- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408 (a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.



- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**  
**[326 IAC 2-7-12 (b)(2)]**

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

##### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

##### **C.11 Monitoring Methods [326 IAC 3]**

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

#### **C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 3, 1997.
- (b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### **C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;



- (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM, may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;

- (3) All calibration and maintenance records;
- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

## **Stratospheric Ozone Protection**

### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) paint production process, identified as EU-01, constructed in 1954, exhausting to the general ventilation stack (GV), with a maximum capacity of 1,308.09 pounds of raw materials per hour, total, consisting of the following:
  - (1) One (1) pebble mill.
  - (2) One (1) steel ball mill.
  - (3) Two (2) sand mills.
  - (4) Three (3) dispersers.
  - (5) Fifteen (15) paint mixers (nine (9) stationary and six (6) portable).
- (b) Four (4) mixing/blending tanks, identified as MT7, MT8, MT9 and MT10, installed in 1998, exhausting to the general ventilation stack (GV), capacity: 475.99 pounds of raw material per hour, total.
- (c) Six (6) mixing tanks, identified as MT1, MT2, MT3, MT4, MT5 and MT6, installed in 1992, exhausting to the general ventilation stack (GV), capacity: 367.91 pounds of raw material per hour, total.
- (d) One (1) mill, identified as SW, exhausting through the general ventilation stack (GV), capacity: 245.09 pounds of raw material per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)[326 IAC 2-4.1-1][326 IAC 8-1-6]

- (a) The raw material input to the six (6) mixing tanks constructed in 1992 shall not exceed 1,664 tons per consecutive twelve (12) month period. Each ton of cleanup solvent used at the six (6) mixing tanks, MT1 through MT6, shall be considered equivalent to 66.7 tons of raw materials input to the paint production process. This will limit the potential to emit VOC from the six (6) mixing tanks (MT1, MT2, MT3, MT4, MT5 and MT6) to less than 25 tons per year, using the emission factor from AP-42 and FIRES of 30 pounds of VOC per ton produced. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these facilities.
- (b) The raw material input to the four (4) mixing/blending tanks constructed in 1998 shall not exceed 1,664 tons per consecutive twelve (12) month period. Each ton of cleanup solvent used at the four (4) mixing/blending tanks, MT7 through MT10, shall be considered equivalent to 66.7 tons of raw materials input to the paint production process. This will limit the potential to emit VOC from the four (4) mixing/blending tanks (MT7, MT8, MT9 and MT10) to less than 25 tons per year and the potential to emit each individual HAP to less than 10 tons per year, using the emission factor from AP-42 and FIRES of 30 pounds of VOC per ton produced and a maximum individual HAP content of thirty-six percent (36.0%) in coatings produced. Therefore, the requirements of 326 IAC 2-4.1-1 and 326 IAC 8-1-6 are not applicable to these facilities.
- (c) The requirement from CP 039-8959-00248, issued on January 28, 1998, Condition 8, that VOC input usage in mixing/blending tanks M7 through MT10 shall be limited to 2,200,621.4 pounds per year (lb/yr), rolled on a monthly basis, which will result in VOC emissions of 22 tons per year, based on a monthly basis is not applicable because the limitation in the

previous permit was not based on the current emission factors. The source will continue to limit VOC emissions to less than 25 tons per year from the four (4) mixing/blending tanks constructed in 1998 as indicated in paragraph (b) of this condition.

- (d) Any change or modification that increases the raw material input to the one (1) mill, identified as SW, to 1,664 tons per year or more, with each ton of cleanup solvent used at the one (1) mill, identified as SW, considered equal to 66.7 tons of raw materials input to the paint production process at the one (1) mill, shall increase the potential to emit VOC to 25 tons per year or more and shall require prior IDEM, OAQ approval.

#### **D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

- (a) The PM from the paint production process shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The requirement from CP 039-8959-00248, issued on January 28, 1998, Operation Condition 9, that pursuant to 326 IAC 6-3 (Process Operations), the pigment handling shall have an allowable PM emissions 0.93 pounds per hour, based on the following equation:  $E = 4.10P^{0.67}$ , where E is the PM allowable emission in pound per hour and P is the process weight rate in ton per hour, is not applicable because the limitations in the previous permit are only for the pigment handling at the four (4) mixing/blending tanks constructed in 1998, and the allowable PM emission rate must reflect the total source capacity for pigment handling.

#### **D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

### **Compliance Determination Requirements**

#### **D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]**

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified by Condition D.1.2(a) shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.1.5 Monitoring**

- (a) Weekly observations shall be made of the particulate from the paint production stack (GV) while the paint production process is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the emissions from the stack and the presence of particulate on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in particulate emission, or evidence of particulate emission is observed. The

Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.6 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with Condition D.1.1.
- (1) The amount and VOC content of each coating produced and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The raw material input to the four (4) mixing/blending tanks, identified as MT7 through MT10, constructed in 1998, and the weight of cleanup solvents used at those tanks;
  - (3) The raw material input to the six (6) mixing tanks constructed in 1992, identified as MT1 through MT6, constructed in 1992, and the weight of cleanup solvents used at those tanks;
  - (4) The raw material input to the one (1) mill, identified as SW, and the weight of cleanup solvents used at that mill;
  - (5) The weight of VOCs and HAPs emitted at the four (4) mixing/blending tanks (MT7, MT8, MT9 and MT10) for each compliance period;
  - (6) The weight of VOCs emitted at the six (6) mixing tanks (MT1, MT2, MT3, MT4, MT5 and MT6) for each compliance period; and
  - (7) The weight of VOCs and HAPs emitted at the one (1) mill, identified as SW, for each compliance period.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain a log of weekly particulate observations and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.7 Reporting Requirements**

A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.



## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:
  - (1) One (1) hot water boiler, installed in 1993, capacity: 0.65 million British thermal units per hour; (326 IAC 6-2-4)
  - (2) One (1) steam boiler, installed in 1992, capacity: 0.45 million British thermal units per hour; (326 IAC 6-2-4)
- (b) A laboratory as defined in 326 IAC 2-7-1(21)(C) (326 IAC 6-3).
- (c) Other categories with emissions below insignificant thresholds:
  - (1) Dry material handling (326 IAC 6-3).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 million British thermal units per hour, Pt shall not exceed 0.6. Therefore, the PM emissions from the two (2) insignificant natural gas fired boilers, shall in no case exceed 0.6 pound of particulate matter per million British thermal units heat input.

The limitation is computed using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

#### D.2.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the dry material handling and the laboratory shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### **Compliance Determination Requirements**

#### **D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Elpaco Coatings Corporation  
Source Address: 28867 Old US 33 West, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 1769, Elkhart, Indiana 46515  
Part 70 Permit No.: T 039-8940-00248

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE DATA SECTION**  
**P.O. Box 6015**  
**100 North Senate Avenue**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Elpaco Coatings Corporation  
Source Address: 28867 Old US 33 West, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 1769, Elkhart, Indiana 46515  
Part 70 Permit No.: T 039-8940-00248

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9</b>	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Quality (OAQ), within four <b>(4)</b> business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two <b>(2)</b> days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<b>9</b>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten <b>(10)</b> calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Elpaco Coatings Corporation  
Source Address: 28867 Old US 33 West, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 1769, Elkhart, Indiana 46515  
Part 70 Permit No.: T 039-8940-00248  
Facility: Six (6) mixing tanks constructed in 1992 (MT1, MT2, MT3, MT4, MT5 and MT6)  
Parameter: Raw material input  
Limit: 1,664 tons per consecutive twelve (12) month period, total, where each ton of cleanup solvent used at the six (6) mixing tanks is considered equivalent to 66.7 tons of raw materials used for paint production input to the tanks.

YEAR: \_\_\_\_\_

Month	Raw materials or equivalent	Raw materials or equivalent	Raw materials or equivalent
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Elpaco Coatings Corporation  
Source Address: 28867 Old US 33 West, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 1769, Elkhart, Indiana 46515  
Part 70 Permit No.: T 039-8940-00248  
Facility: Four (4) mixing/blending tanks constructed in 1998 (MT7, MT8, MT9 and MT10)  
Parameter: Raw material input  
Limit: 1,664 tons per consecutive twelve (12) month period, total, where each ton of cleanup solvent used at the four (4) mixing/blending tanks is considered equivalent to 66.7 tons of raw materials used for paint production input to the tanks.

YEAR: \_\_\_\_\_

Month	Raw materials or equivalent	Raw materials or equivalent	Raw materials or equivalent
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Elpaco Coatings Corporation  
Source Address: 28867 Old US 33 West, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 1769, Elkhart, Indiana 46515  
Part 70 Permit No.: T 039-8940-00248

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Part 70 Minor Source Modification**

#### **Source Background and Description**

<b>Source Name:</b>	<b>Elpaco Coatings Corporation</b>
<b>Source Location:</b>	<b>28867 Old US 33 West, Elkhart, Indiana 46516</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>2851</b>
<b>Operation Permit No.:</b>	<b>T 039-8940-00248</b>
<b>Operation Permit Issuance Date:</b>	<b>January 19, 2000</b>
<b>Minor Source Modification No.:</b>	<b>039-14183-00248</b>
<b>Permit Reviewer:</b>	<b>CarrieAnn Ortolani</b>

The Office of Air Quality (OAQ) has reviewed a modification application from Elpaco Coatings Corporation relating to the construction of the following emission units and pollution control devices:

One (1) mill, identified as SW, exhausting through the general ventilation stack (GV), capacity: 245.09 pounds of raw material per hour.

The source believes that the information submitted in the Part 70 Permit application was not correct and has applied for a re-evaluation of the emissions from the following emissions units and pollution control devices:

- (a) One (1) paint production process, identified as EU-01, constructed in 1954, exhausting to the general ventilation stack (GV), with a maximum capacity of 1,308.09 pounds of raw material per hour, total, consisting of the following:
  - (1) One (1) pebble mill.
  - (2) One (1) steel ball mill.
  - (3) Two (2) sand mills.
  - (4) Three (3) dispersers.
  - (5) Fifteen (15) paint mixers (nine (9) stationary and six (6) portable).
- (b) Four (4) mixing/blending tanks, identified as MT7, MT8, MT9 and MT10, installed in 1998, exhausting to the general ventilation stack (GV), capacity: 475.99 pounds of raw material per hour, total.
- (c) Six (6) mixing tanks, identified as MT1, MT2, MT3, MT4, MT5 and MT6, installed in 1992, exhausting to the general ventilation stack (GV), capacity: 367.91 pounds of raw material per hour, total.

## History

On March 26, 2001, Elpaco Coatings Corporation submitted information regarding the capacity and potential to emit of the existing source. Elpaco Coatings Corporation requested that the potential to emit of the source be re-evaluated based on corrected capacities of the facilities at the existing source. On April 19, 2000, Elpaco Coatings Corporation submitted an application to the OAQ requesting to add an additional mill, identified as SW, to their existing plant. On May 2, 2001, Elpaco Coatings Corporation submitted additional information requesting to increase the capacity of mix tanks MT-2 and MT-7 as part of this modification. The applicant will continue to comply with the existing permit limitations for those tanks. Those requests are being combined into the application from March 26, 2001, and will be addressed in this minor source modification and the significant permit modification (SPM 039-14300-00248). Elpaco Coatings Corporation was issued a Part 70 permit (T 039-8940-00248) on January 19, 2000. Administrative Amendments 039-11967 and 039-11995 were issued on April 12, 2000 and August 4, 2000, respectively.

## Enforcement Issue

There are no enforcement actions pending.

## Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
GV	General Ventilation Stack	20.0	1.5	2,300	Ambient

## Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 19, 2000. Additional information was received on July 25, July 28, August 31, September 18, and September 22, 2000; and March 26 and May 2, 2001.

## Emission Calculations

See pages 1 through 2 of 2 of Appendix A of this document for detailed emissions calculations.

## Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. The modification is the addition of

the new mill, identified as SW. The new mill will increase the efficiency of the paint production process, but not increase the potential to emit of the existing facilities. Also, the increase in the size of the two (2) mixing tanks, MT-2 and MT-7, will result in the need for less material changes and will result in better efficiency, but will not increase the potential to emit of the source.

Pollutant	Potential To Emit (tons/year)
PM	4.51
PM <sub>10</sub>	4.51
SO <sub>2</sub>	0.00
VOC	22.1
CO	0.00
NO <sub>x</sub>	0.00

HAPs	Potential To Emit (tons/year)
MEK	8.92
Xylene	0.390
Toluene	1.50
TOTAL	10.8

#### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4), "Modifications that would have a potential to emit less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of volatile organic compounds (VOC) for modifications that do not require the use of air pollution control equipment to comply with the applicable provisions of 326 IAC 8." This Minor Source Modification gives the approval to construct the new mill. The Significant Permit Modification (SPM 039-14360-00248) will give the source approval to operate the mill.

#### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance attainment for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	40.8
PM <sub>10</sub>	40.9
SO <sub>2</sub>	0.005
VOC	169
CO	0.655
NO <sub>x</sub>	0.780

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories. The source has never had actual emissions at or above major source levels.
- (b) These emissions are based upon the calculated potential to emit of the source. See pages 1 and 2 of 2 of TSD Appendix A for detailed calculations.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

### Potential to Emit of Modification and Existing Source After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification. The potential to emit of the entire source is included in this table because the potential to emit was recalculated as part of this approval.

	<b>Potential to Emit (tons/year)</b>						
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Proposed Modification (one (1) mill, identified as SW)	6.99	6.99	0.00	less than 25	0.00	0.00	8.99 individual and 8.99 total
Original Source with Corrected Emission rates	24.1	24.1	0.00	118	0.00	0.00	47.6 individual and 57.7 total
Six (6) mixing tanks, identified as MT1 - MT6, constructed in 1992	6.99	6.99	0.00	less than 25	0.00	0.00	8.99 individual and 8.99 total
Four (4) mixing/blending tanks, identified as MT7 - MT10, constructed in 1998	6.99	6.99	0.00	less than 25	0.00	0.00	8.99 individual and 8.99 total
Insignificant Activities	2.74	2.79	0.005	0.773	0.655	0.780	Less than 1.0 individual and total
Total	47.8	47.9	0.005	less than 194	0.655	0.780	75.6 individual 85.7 total
PSD Threshold Level	250	250	250	250	250	250	-

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) This source is not a major for PSD because the total potential to emit is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

#### Federal Rule Applicability

- (a) This minor source modification does not involve a pollutant-specific emissions unit with the potential to emit after control in an amount equal to or greater than 100 tons per year. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.
- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (c) The nine (9) above ground vertical fixed-roof storage tanks, identified as TF-1 through TF-9, constructed in 1991, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, 60.110a and 60.110b), Subparts K, Ka, and Kb, because each tank has a capacity less than 40 cubic meters.

- (d) The mixing and mixing/blending tanks are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, 60.110a and 60.110b), Subparts K, Ka, and Kb, because these tanks are not storage tanks and each tank has a capacity less than 40 cubic meters.
- (e) The requirements of the National Emission Standards for Equipment Leaks, 40 CFR 61.240, Subpart V, are not applicable to this source, because no other subpart of 40 CFR Part 61 is applicable.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 326 IAC 20; 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

#### **State Rule Applicability - Individual Facilities**

##### **326 IAC 2-4.1-1 (New Source Toxics Control)**

- (a) The requirements of 326 IAC 2-4.1-1 can be applicable to the four (4) mixing/ blending tanks constructed in 1998 because they have the potential to emit more than 10 tons per year of an individual HAP. As a result of the production limits necessary to limit VOC emissions to less than 25 tons per year and a maximum individual HAP content of thirty-six percent (36%), the HAP emissions from the four (4) mixing/blending tanks will be limited to less than 10 tons per year of each individual HAP. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.
- (b) Since the potential to emit each individual HAP from the one (1) mill, identified as SW, is less than 10 tons per year and the potential to emit any combination of HAPs from the one (1) mill, identified as SW, is less than 25 tons per year, the requirements of 326 IAC 2-4.1-1 are not applicable.
- (c) All other facilities were constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

##### **326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the paint production process will be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

##### **326 IAC 8-1-6 (New Facilities; General reduction requirements)**

- (a) The potential to emit VOC at the one (1) mill, identified as SW, is less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to this facility.
- (b) The six (6) mixing tanks constructed in 1992 have the potential to emit more than 25 tons per year of VOC (see page 1 of 2 of TSD Appendix A). Therefore, the requirements of 326 IAC 8-1-6 can be applicable. Pursuant to T 039-8940-00248, issued on January 19, 2000, the source has agreed to limit VOC emissions from the six (6) mixing tanks (MT1, MT2, MT3, MT4, MT5 and MT6) to less than 25 tons per year. The source will limit the raw material input to the six (6) mixing tanks (MT1, MT2, MT3, MT4, MT5 and MT6) to 1,664 tons per consecutive twelve (12) month period. Since the total potential to emit from the

facility must be limited, the amount of cleanup solvents used as the six (6) mixing tanks, MT1 through MT6, must also be included in that limit. Each ton of cleanup solvent used shall be considered equivalent to 66.7 tons of raw materials input to the paint production process. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these facilities.

- (c) The four (4) mixing/blending tanks constructed in 1998 have the potential to emit more than 25 tons per year of VOC (see page 1 of 2 of TSD Appendix A). Therefore, the requirements of 326 IAC 8-1-6 can be applicable. Pursuant to T 039-8940-00248, issued on January 19, 2000, the source has agreed to limit VOC emissions from the four (4) mixing/blending tanks (MT7, MT8, MT9 and MT10) to less than 25 tons per year. The source will limit the raw material input to the four (4) mixing/blending tanks (MT7, MT8, MT9 and MT10) to 1,664 tons per consecutive twelve (12) month period. Since the total potential to emit from the facility must be limited, the amount of cleanup solvents used as the four (4) mixing/blending tanks, MT7 through MT10, must also be included in that limit. Each ton of cleanup solvent used shall be considered equivalent to 66.7 tons of raw materials input to the paint production process. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these facilities.
- (d) All other significant facilities were constructed prior to January 1, 1980 and all insignificant activities have a potential to emit less than 25 tons per year of VOC. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to those facilities.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The one (1) mill, identified as SW, has applicable compliance monitoring conditions as specified below:

- (a) Weekly observations shall be made of the particulate from the paint production stack (GV) while the paint production process is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the emissions from the stack and the presence of particulate on the rooftops and the nearby ground. The Compliance Response Plan for

this unit shall contain troubleshooting contingency and response steps for when a noticeable change in particulate emission, or evidence of particulate emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### Proposed Changes

The one (1) mill, identified as SW, is the only new emission unit at this source. All changes in the descriptions of the existing emission units are corrections to the way the emission units are described in the permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

#### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary paint production source.

Responsible Official: Max Wyatt  
Source Address: 28867 Old US 33 West, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 1769, Elkhart, Indiana 46515  
Phone Number: 219-295-3991  
SIC Code: 2851  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
~~Major~~ **Minor** Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint production process, identified as EU-01, constructed in 1954, exhausting to the general ventilation stack (GV), with a maximum capacity of ~~7,656~~ **1,308.09** pounds of raw materials per hour, **total**, consisting of the following:
- ~~(a)~~ **(1)** One (1) pebble mill.
  - ~~(b)~~ **(2)** One (1) steel ball mill.
  - ~~(c)~~ **(3)** Two (2) sand mills.
  - ~~(d)~~ **(4)** Three (3) dispersers.
  - ~~(e) (5) Nine (9) paint mixers.~~ **Fifteen (15) paint mixers (nine (9) stationary and six (6) portable).**



- ~~(f)~~ **(b)** ~~One (1) mixing/blending tank, identified as MT7, installed in 1998, capacity: 2,000 gallons.~~  
**Four (4) mixing/blending tanks, identified as MT7, MT8, MT9 and MT10, installed in 1998, exhausting to the general ventilation stack (GV), capacity: 475.99 pounds of raw material per hour, total.**
- ~~(g)~~ ~~Two (2) mixing/blending tanks, identified as MT8 and MT9, installed in 1998, capacity: 750 gallons, each.~~
- ~~(h)~~ ~~One (1) mixing/blending tank, identified as MT10, installed in 1998, capacity: 660 gallons.~~
- ~~(i)~~ **(c)** ~~Four (4) mixing tanks, identified as MT1, MT2, MT3, and MT4, installed in 1992, capacity: 660 gallons, each.~~ **Six (6) mixing tanks, identified as MT1, MT2, MT3, MT4, MT5 and MT6, installed in 1992, exhausting to the general ventilation stack (GV), capacity: 367.91 pounds of raw material per hour, total.**
- ~~(j)~~ ~~Two (2) mixing tanks, identified as MT5 and MT6, installed in 1992, capacity: 440 gallons, each.~~
- (d) One (1) mill, identified as SW, exhausting through the general ventilation stack (GV), capacity: 245.09 pounds of raw material per hour.**

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:**
  - (1) One (1) hot water boiler, installed in 1993, capacity: 0.65 million British thermal units per hour; (326 IAC 6-2-4)**
  - (2) One (1) steam boiler, installed in 1992, capacity: 0.45 million British thermal units per hour; (326 IAC 6-2-4)**
- (b) A laboratory as defined in 326 IAC 2-7-1(21)(C) (326 IAC 6-3).**
- ~~(b)~~ **(c) Other categories with emissions below insignificant thresholds:**
  - (1) Dry material handling (326 IAC 6-3).**

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) paint production process, identified as EU-01, constructed in 1954, exhausting to the general ventilation stack (GV), with a maximum capacity of ~~7,656~~ **1,308.09** pounds of raw materials per hour, **total**, consisting of the following:
- ~~(a) (1)~~ One (1) pebble mill.
  - ~~(b) (2)~~ One (1) steel ball mill.
  - ~~(c) (3)~~ Two (2) sand mills.
  - ~~(d) (4)~~ Three (3) dispersers.
  - ~~(e) (5)~~ ~~Nine (9) paint mixers.~~ **Fifteen (15) paint mixers (nine (9) stationary and six (6) portable).**
- ~~(f) (b)~~ ~~One (1) mixing/blending tank, identified as MT7, installed in 1998, capacity: 2,000 gallons.~~ **Four (4) mixing/blending tanks, identified as MT7, MT8, MT9 and MT10, installed in 1998, exhausting to the general ventilation stack (GV), capacity: 475.99 pounds of raw material per hour, total.**
- ~~(g)~~ ~~Two (2) mixing/blending tanks, identified as MT8 and MT9, installed in 1998, capacity: 750 gallons, each.~~
- ~~(h)~~ ~~One (1) mixing/blending tank, identified as MT10, installed in 1998, capacity: 660 gallons.~~
- ~~(i) (c)~~ ~~Four (4) mixing tanks, identified as MT1, MT2, MT3, and MT4, installed in 1992, capacity: 660 gallons, each.~~ **Six (6) mixing tanks, identified as MT1, MT2, MT3, MT4, MT5 and MT6, installed in 1992, exhausting to the general ventilation stack (GV), capacity: 367.91 pounds of raw material per hour, total.**
- ~~(j)~~ ~~Two (2) mixing tanks, identified as MT5 and MT6, installed in 1992, capacity: 440 gallons, each.~~
- (d) One (1) mill, identified as SW, exhausting through the general ventilation stack (GV), capacity: 245.09 pounds of raw material per hour.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC), **and** Hazardous Air Pollutants (HAPs) ~~and Particulate Matter (PM and PM<sub>10</sub>)~~ [326 IAC 2-2] ~~[40 CFR 52.21]~~ [326 IAC 2-4.1-1] [326 IAC 8-1-6]

- (a) The raw material input to the six (6) mixing tanks constructed in 1992 shall not exceed 1,664 tons per consecutive twelve (12) month period. **Each ton of cleanup solvent used at the six (6) mixing tanks, MT1 through MT6, shall be considered equivalent to 66.7 tons of raw materials input to the paint production process.** This will limit the potential to emit VOC from the six (6) mixing tanks (MT1, MT2, MT3, MT4, MT5 and MT6) to less than 25 tons per year ~~and the potential to emit PM<sub>10</sub> to less than 15 tons per year, using the emission factors from AP-42 and FIRES of 30 pounds of VOC per ton produced and 20 pounds of PM and PM<sub>10</sub> per ton of pigment handled.~~ Therefore, the requirements of 326 IAC 2-2, 40 CFR 52.21, and 326 IAC 8-1-6 are not applicable to these facilities.
- (b) The raw material input to the four (4) mixing/blending tanks constructed in 1998 shall not exceed 1,664 tons per consecutive twelve (12) month period. **Each ton of cleanup solvent used at the four (4) mixing/blending tanks, MT7 through MT10, shall be**

**considered equivalent to 66.7 tons of raw materials input to the paint production process.** This will limit the potential to emit VOC from the four (4) mixing/blending tanks (MT7, MT8, MT9 and MT10) to less than 25 tons per year, ~~the potential to emit PM to less than 25 tons per year, the potential to emit PM<sub>10</sub> to less than 15 tons per year,~~ and the potential to emit each individual HAP to less than 10 tons per year, using the emission factors from AP-42 and FIRES of 30 pounds of VOC per ton produced and **a maximum individual HAP content of thirty-six percent (36.0%) in coatings produced** ~~20 pounds of PM and PM<sub>10</sub> per ton of pigment handled.~~ Therefore, the requirements of 326 IAC 2-4.1-1, ~~326 IAC 2-2, 40 CFR 52.21,~~ and 326 IAC 8-1-6 are not applicable to these facilities.

- (c) The requirement from CP 039-8959-00248, issued on January 28, 1998, Condition 8, that VOC input usage in mixing/blending tanks M7 through MT10 shall be limited to 2,200,621.4 pounds per year (lb/yr), rolled on a monthly basis, which will result in VOC emissions of 22 tons per year, based on a monthly basis is not applicable because the limitation in the previous permit was not based on the current emission factors. The source will continue to limit VOC emissions to less than 25 tons per year from the four (4) mixing/blending tanks constructed in 1998 as indicated in paragraph (b) of this condition.
- (d) **Any change or modification that increases the raw material input to the one (1) mill, identified as SW, to 1,664 tons per year or more, with each ton of cleanup solvent used at the one (1) mill, identified as SW, considered equal to 66.7 tons of raw materials input to the paint production process at the one (1) mill, shall increase the potential to emit VOC to 25 tons per year or more and shall require prior IDEM, OAQ approval.**

#### D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(7)** below. Records maintained for (1) through ~~(5)~~ **(7)** shall be taken monthly and shall be complete and sufficient to establish compliance with Condition D.1.1.
  - (1) The amount and VOC content of each coating produced and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The raw material input to the four (4) mixing/blending tanks, **identified as MT7 through MT10**, constructed in 1998, **and the weight of cleanup solvents used at those tanks;**
  - (3) The raw material input to the six (6) mixing tanks constructed in 1992, **identified as MT1 through MT6**, constructed in 1992, **and the weight of cleanup solvents used at those tanks;**
  - (4) **The raw material input to the one (1) mill, identified as SW, and the weight of cleanup solvents used at that mill;**
  - ~~(4)~~ **(5)** The weight of VOCs, ~~PM, PM<sub>10</sub>~~ and HAPs emitted at the four (4) mixing/blending tanks (MT7, MT8, MT9 and MT10) for each compliance period; **and**
  - ~~(5)~~ **(6)** The weight of VOCs, ~~PM, PM<sub>10</sub>~~ and HAPs emitted at the six (6) mixing tanks (MT1, MT2, MT3, MT4, MT5 and MT6) for each compliance period; **and**

**(7) The weight of VOCs and HAPs emitted at the one (1) mill, identified as SW, for each compliance period.**

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain a log of weekly particulate observations and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.7 Reporting Requirements**

A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)] - Insignificant Activities**

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:
  - (1) One (1) hot water boiler, installed in 1993, capacity: 0.65 million British thermal units per hour; (326 IAC 6-2-4)
  - (2) One (1) steam boiler, installed in 1992, capacity: 0.45 million British thermal units per hour; (326 IAC 6-2-4)
- (b) **A laboratory as defined in 326 IAC 2-7-1(21)(C) (326 IAC 6-3).**
- (b) (c) Other categories with emissions below insignificant thresholds:
  - (1) Dry material handling (326 IAC 6-3).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**D.2.2 Particulate Matter (PM) [326 IAC 6-3]**

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the dry material handling **and the laboratory** shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

On January 1, 2001, the name of the Office of Air Management (OAM) was changed to the Office of Air Quality (OAQ). All references to the Office of Air Management or OAM in this permit have been changed to Office of Air Quality or OAQ.

The report forms have been revised as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Elpaco Coatings Corporation  
Source Address: 28867 Old US 33 West, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 1769, Elkhart, Indiana 46515  
Part 70 Permit No.: T 039-8940-00248  
Facility: Six (6) mixing tanks constructed in 1992 (MT1, MT2, MT3, MT4, MT5 and MT6)  
Parameter: Raw material input  
Limit: 1,664 tons per consecutive twelve (12) month period, total, **where each ton of cleanup solvent used at the six (6) mixing tanks is considered equivalent to 66.7 tons of raw materials used for paint production input to the tanks.**

YEAR: \_\_\_\_\_

Month	Column 1 Raw materials or equivalent	Column 2 Raw materials or equivalent	Column 1 + Column 2 Raw materials or equivalent
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by:

Title/Position:

Signature:

Date:

Phone:

**Attach a signed certification to complete this report.**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Elpaco Coatings Corporation  
Source Address: 28867 Old US 33 West, Elkhart, Indiana 46516  
Mailing Address: P.O. Box 1769, Elkhart, Indiana 46515  
Part 70 Permit No.: T 039-8940-00248  
Facility: Four (4) mixing/blending tanks constructed in 1998 (MT7, MT8, MT9 and MT10)  
Parameter: Raw material input  
Limit: 1,664 tons per consecutive twelve (12) month period, total, **where each ton of cleanup solvent used at the four (4) mixing/blending tanks is considered equivalent to 66.7 tons of raw materials used for paint production input to the tanks.**

YEAR: \_\_\_\_\_

Month	Column 1 Raw materials or equivalent	Column 2 Raw materials or equivalent	Column 1 + Column 2 Raw materials or equivalent
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this month.  
9 Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by:

Title/Position:

Signature:

Date:

Phone:

**Attach a signed certification to complete this report.**

**Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 039-14183-00248.

Appendix A: Emissions Calculations

Company Name: Elpaco Coatings Corporation  
Address City IN Zip: 28867 Old US 33 West, Elkhart, Indiana 46516  
Source Modification No.: MSM 039-14183  
Plt ID: 039-00248  
Reviewer: CarrieAnn Orlolani  
Date: March 26, 2001

Paint Production

VOC

Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)
Original Source (1954)	30	1308.09	100.00%	19.6	85.9
Six (6) mixing tanks (1992)	30	367.91	100.00%	5.52	24.2
Four (4) mixing/blending tanks (1998)	30	475.99	100.00%	7.14	31.3
New Mill	30	245.09	100.00%	3.68	16.1
Total:					157.5

HAPs

Facility Group	Max. Weight % MEK	Max. Weight % Toluene	Max. Weight % Total HAPs	EF (lb/ton)	PTE MEK (tons/yr)	PTE Toluene (tons/yr)	PTE Total HAPs (tons/yr)
Original Source (1954)	36.0%	11.0%	36.0%	30	30.94	9.45	30.94
Six (6) mixing tanks (1992)	36.0%	11.0%	36.0%	30	8.70	2.66	8.70
Four (4) mixing/blending tanks (1998)	36.0%	11.0%	36.0%	30	11.26	3.44	11.26
New Mill	36.0%	11.0%	36.0%	30	5.80	1.77	5.80
Totals:					56.7	17.3	56.7

PM and PM-10

Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % Solids	PTE (lbs/hr)	PTE (tons/yr)
Original Source (1954)	20	1308.09	42.00%	5.49	24.1
Six (6) mixing tanks (1992)	20	367.91	42.00%	1.55	6.77
Four (4) mixing/blending tanks (1998)	20	475.99	42.00%	2.00	8.76
New Mill	20	245.09	42.00%	1.03	4.51
Total:					44.1

Emission Factors from AP-42, Chapter 6.4, Table 6.4-1 and Fire 6.2

Cleanup Solvents

	Usage (lbs/2040 hrs)	Potential Usage (lbs/hr)	Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)
Non-HAP solvent	4512	2.21	100.00%	2.21	9.69
MEK	14221	6.97	100.00%	6.97	30.5
Toluene	6837	3.35	100.00%	3.35	14.7
Xylene	1778	0.87	100.00%	0.872	3.82
VOC Total:					58.7
HAP Total:					49.0

Facility Group	Weight % of total Source Capacity	PTE VOC (tons/yr)	PTE total HAPs (tons/yr)	PTE individual HAP (tons/yr)
Original Source (1954)	54.57%	32.0	26.8	16.7
Six (6) mixing tanks (1992)	15.35%	9.01	7.53	4.69
Four (4) mixing/blending tanks (1998)	19.86%	11.7	9.74	6.06
New Mill	10.22%	6.00	5.01	3.12

Totals

Facility Group	PTE VOC (tons/yr)	PTE individual HAP (tons/yr)	PTE total HAPs (tons/yr)	PTE PM (tons/yr)	Limited Raw Material Input to Paint Production Capacity (tons/yr)	Limited PTE VOC from paint production (tons/yr)	Equivalency of each ton of cleanup solvent to tons of raw material input to paint production (tons)	Limited PTE single HAP from paint production (tons/yr)	Limited PTE single HAP from paint production (tons/yr)	Limited PTE PM from paint production (tons/yr)
Original Source (1954)	118	47.6	57.7	24.1	n/a	n/a	n/a	n/a	n/a	n/a
Six (6) mixing tanks (1992)	33.2	13.4	16.2	6.77	1664	24.96	66.7	8.99	8.99	6.99
Four (4) mixing/blending tanks (1998)	42.9	17.3	21.0	8.76	1664	24.96	66.7	8.99	8.99	6.99
New Mill	22.1	8.92	10.8	4.51	1664	24.96	66.7	8.99	8.99	6.99
	216	87.2	106	44.1						

METHODOLOGY

Paint Production

PTE VOC (lbs/hr) = Capacity (lbs/hr) \* Weight % Organics \* (EF (lb/ton) / 2000 lbs/ton)

PTE VOC (tons/yr) = PTE VOC (lbs/hr) \* 8,760 hrs/yr / 2000 lbs/ton

PTE PM (lbs/hr) = Capacity (lbs/hr) \* Weight % Solids \* (EF (lb/ton) / 2000 lbs/ton)

PTE PM (tons/yr) = PTE PM (lbs/hr) \* 8,760 hrs/yr / 2000 lbs/ton

Cleanup Solvent

PTE (lbs/day) = (Usage (lbs/2040 hrs) / 2040 hrs) \* Weight % VOC

PTE (tons/yr) = PTE (lbs/day) \* 8760 hrs/yr / 2000 lbs/ton



# Appendix A: Emissions Calculations

Company Name: Elpaco Coatings Corporation  
Address City IN Zip: 28867 Old US 33 West, Elkhart, Indiana 46516  
Source Modification No.: MSM 039-14183  
Plt ID: 039-00248  
Reviewer: CarrieAnn Otolani  
Date: March 26, 2001

## Insignificant Activities

Tanks	Contents	Emissions (lbs/yr)	Emissions (tons/yr)
TF-1	VM&P Naphtha	79.3	0.040
TF-2	Toluene	26.8	0.013
TF-3	Xylene	13.7	0.007
TF-4	Aromatic 100	4.20	0.002
TF-5	Isopropyl alcohol	20.1	0.010
TF-6	Isobutyl alcohol	8.01	0.004
TF-7	n-Butyl acetate	6.35	0.003
TF-8	Glycol ether	0.00	0.000
TF-9	MEK	70.3	0.035
		<b>229</b>	<b>0.114</b>

## Methodology

The tank emissions were calculated using Tanks 3.0

## Combustion

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.78	15.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.015	0.059	0.005	0.780	0.043	0.655

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

## Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

## Dry Material Handling

Capacity (lbs/yr)	PM Emission Factor (lbs PM/ton material)	PM Emissions (lbs/hr)	PM Emissions (tons/yr)
1973797	5.5	0.620	2.71

## VOC

Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % VOC	PTE (lbs/hr)	PTE (tons/yr)
Laboratory	30	0.936	100.00%	0.014	0.061
Solvent filling	30	8.45	100.00%	0.127	0.555

## PM and PM-10

Facility Group	EF (lb/ton)	Capacity (lbs/hr)	Max. Weight % Solids	PTE (lbs/hr)	PTE (tons/yr)
Laboratory	20	0.936	42.00%	0.004	0.017

Emission Factors from AP-42, Chapter 6.4, Table 6.4-1 and Fire 6.2